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Serial No. 10/606,257

## REMARKS

Consideration of the above-identified application in view of the present amendment is respectfully requested. By the present amendment, claims 1-22 are pending. Claims 1, 4, 16, 17, and 18 are amended and claims 20-22 are added. Claim 19 is allowed.

Claim 1 as amended recites a modular headliner assembly for a vehicle having a side structure and a roof. The headliner assembly comprises a headliner and an inflatable vehicle occupant protection device inflatable away from the vehicle roof into a position between the side structure of the vehicle and a vehicle occupant. The headliner assembly also comprises a fill tube having a portion located in the inflatable vehicle occupant protection device and a support device having a portion that clamps around a portion of the fill tube and connects the fill tube and the inflatable vehicle occupant protection device to the support device.

The headliner assembly also comprises a grab handle having a portion that extends through the headliner and into the support device. The grab handle is releasably interconnected with the support device and the grab handle holds the headliner connected with the support device. The grab handle is releasable to enable removal of the headliner from the support device and the vehicle occupant restraint. The headliner assembly further comprises a first connector that connects the support device to the vehicle and initially connects the modular headliner assembly to the vehicle, and a second connector that extends through the support device and

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the grab handle and fixedly connects the modular headliner assembly to the vehicle.

This structure is not taught or suggested in the references cited in the Office Action. Neither Wong et al. (US 2002/0125705 A1) nor Rickabus (US 5,931,525) disclose a support device that clamps onto a fill tube and connects the fill tube and inflatable curtain to the support device. Rickabus does not disclose any vehicle occupant protection devices or fill tubes whatsoever. In Wong et al., it is not clear at all what relation, if any, the envelope 146 has to the fill tube 26. In Wong et al., one cannot even tell if the fill tube extends into any portion of the envelope. As shown in Fig. 1, the fill tube interfaces with the inflatable curtain at the rear of the curtain. Looking at Fig. 2, however, which is sectioned near the rear of the curtain, there is no sign of the fill tube having any portion located in the envelope 146. In fact, none of the cross-sectional views in Wong et al. show the fill tube.

Also, as shown in Figs. 4, 7, and 8, the inflatable curtain appears to be stored in a relatively loosely folded manner in the envelope, i.e., there appears to be substantial free space for movement within the envelope. Thus, even if the fill tube had a portion disposed in the envelope, the envelope certainly would not clamp onto the tube. Furthermore, the envelope, as described at paragraph [0090], is constructed of a flexible material and the only material given as an example is a such as a fabric. Certainly, one has to stretch the imagination to come up with a construction of

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the envelope, using a material with the flexibility of a fabric, that could effectively clamp onto the fill tube.

Also, there is no grab handle and second connector in Wong et al. that is releasable to enable removal of the headliner from the support device and the vehicle occupant restraint. As clearly stated in Wong et al., the headliner is installed after the module 50 is installed in the vehicle (see paragraphs [0073], [0098], and [0112]). The push-in connectors and threaded connectors in Wong et al. do not connect the headliner to the vehicle and thus are not removed such that the headliner releases from the vehicle. In Rickabus, there is no inflatable curtain and, if the threaded fastener is removed, the entire headliner assembly is disconnected from the vehicle and no part of the module remains connected to the vehicle.

For the reasons set forth above, it is respectfully submitted that Wong et al. and Rickabus, alone or in combination, do not disclose all of the features recited in claim 1. Therefore, claim 1 should be allowed. Claims 2, 3, and 8-15 depend from claim 1 and are therefore allowable as depending from an allowable claim and for the specific features recited therein.

Claims 16 and 17 also recite a support device that has a portion that clamps around a fill tube. The claims further recite that the grab handle is releasable to enable removal of the headliner from the support device and the vehicle occupant restraint. As set forth above in regard to claim 1, Wong et

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al. and Rickabus do not teach or suggest this structure.

Therefore, claims 16 and 17 should also be allowed.

Applicant appreciates the allowance of claims 4-7 if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Accordingly, these claims are amended to include all of the limitations of the base claim and intervening claims.

Therefore, claims 4-7 are allowable.

Claim 18 as amended recites an apparatus including a headliner, an inflatable side curtain, and a grab handle assembled together as a module. The apparatus also includes a push-in connector for initially connecting the module to the vehicle. The apparatus further includes a threaded connector that extends through the grab handle and fixedly connects the module to the vehicle. The threaded connector and grab handle are removed such that the headliner releases from the vehicle. The push-in connector maintains the side curtain connected to the vehicle while the headliner and grab handle are removed.

This structure is not taught or suggested in Wong et al. or Rickabus. In Wong et al., there is no grab handle and second connector that are removed such that the headliner release from the vehicle while leaving the inflatable curtain installed via the push-in fasteners. As clearly stated in Wong et al., the headliner is installed after the module 50 is installed in the vehicle (see paragraphs [0073], [0098], and [0112]). The push-in and threaded connectors in Wong et al. do not connect the headliner to the vehicle and thus are not removed such that the headliner releases from the vehicle. In

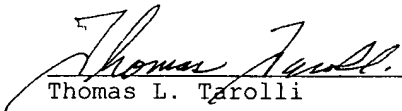
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In view of the foregoing, it is respectfully submitted that the above identified application is in condition for allowance, and allowance of the above-identified application is respectfully requested.

Please charge any deficiency or credit any overpayment in the fees for this amendment to our Deposit Account No. 20-0090.

Respectfully submitted,

  
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